

WASTE MANAGEMENT PROGRAM REDESIGN RECOMMENDATIONS GRID

Business Function	Management System			Structure		
	Options	Pros	Cons	Options	Pros	Cons
PLAN REVIEW AND LICENSING	<ul style="list-style-type: none"> Green tier (HW, SPW) <ul style="list-style-type: none"> 2 TSD facilities, as a pilot Long-term – all 18 TSDs 	<ul style="list-style-type: none"> -save staff time - improved environment benefit -less command & control (C&C) 	<ul style="list-style-type: none"> -EPA agreement -staff training 	“Centralize” or use a Specialty Team 1 staff**	<ul style="list-style-type: none"> -efficient resource use -consistent -ease of getting your answer 	<ul style="list-style-type: none"> -staff acceptance -less local connection or licensing -file location -staff vacancies could be difficult to address
	<ul style="list-style-type: none"> Streamline licensing process, for those not interested or qualified for Green Tier (HW, SPW, SW) <ul style="list-style-type: none"> Continue SW Streamlining Process: Reduce review of ‘as-builts’, Increase on-site construction inspections; ID precedent setting issues for review; Complete data model flow chart in detail 	<ul style="list-style-type: none"> -save staff time - quicker service - better use of staff time 		‘Centralize’ or Specialty Team 2 staff specialize in HW licensing	<ul style="list-style-type: none"> -efficient resource use -consistent -ease of getting your answer 	<ul style="list-style-type: none"> -staff acceptance -less local connection or licensing -file location -staff vacancies could be difficult to address
	<ul style="list-style-type: none"> Self Certification (SPW, RCY, SW) <ul style="list-style-type: none"> For RCY, require Self Cert. of currently exempt facilities Non-complex SW facilities (transfer, compost, one-time disposal, low hazard) <p>300 – 500 facilities</p>	<ul style="list-style-type: none"> -save staff time - facility is responsible -less C&C -cover more facilities -better environ. Protection -some inc. reg. Authority and fees (RCY) -level playing field 	<ul style="list-style-type: none"> -higher risk -staff acceptance - environ. group acceptance -this is a diverse group/loss of control -significant outreach investment -more workload (us and them) (RCY) -statutory changes 	Central submittal w/ regional contacts -central data manager -experts not necessarily in one geographic location (SPW) 2 staff experts in self-certification + regional contacts, inspectors, auditors	<ul style="list-style-type: none"> -increase efficiencies -consistency -better decision-making -better resource deployment -use data more 	<ul style="list-style-type: none"> -training on use of common data base -loss of familiarity w/ facility

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	<ul style="list-style-type: none"> Long Term – Evaluate using a company wide approval (SW) 	<ul style="list-style-type: none"> -see above -see WAMT issue paper from August '05 conf. call -improve integration 	<ul style="list-style-type: none"> -see above - see WAMT issue paper from August '05 conf. call - extra fee? 	Needs future study group		
	<ul style="list-style-type: none"> Technical review “process” (SW) <ul style="list-style-type: none"> Hydro and Engineer experts (1 each) oversee plan review assignments and work Designate specific hydros and engineers to do landfill and incinerator reviews Experts would review all plan review decisions that are unusual and precedent setting Signature authority is Regional Supervisor, plan reviewers and 1 of the experts Experts would ensure up-to-date technical knowledge of plan review and work on mentoring amongst designated plan review staff 			1 Engineer, 1 Hydro Expert 8 Engineers (dedicated) 8 Hydros (dedicated) Also do on-site inspections (construction, operation) Reduce reviews of as-builts		
INSPECTIONS, AUDITS, PROGRAM EVALUATIONS	<ul style="list-style-type: none"> Green Tier Facilities (HW, SPW, SW) <ul style="list-style-type: none"> part of 5 year license spot checks 	<ul style="list-style-type: none"> - conserve measures - more buy-in - focus on the greatest environ. impact - move to less use of toxics - move towards Zero waste 	<ul style="list-style-type: none"> -inc. risk -convince EPA 			
	Focus inspections on small and very small generators (HW)	<ul style="list-style-type: none"> - help small & very small understand laws better 		Shift from large quantity to small & very small quantity generators 10 staff		
	Self reporting of self audits (HW) - e-transfer of the information					
	Work with local fire depts. To do joint inspections etc. (HW)					
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	Self inspections and report for sites, with reduced DNR inspections (SW)	-trust, efficiency -customer service	-risk -\$ -time c	5 staff (for this and other activities listed below)		
	Staff use “notebooks” w/ electronic upload of inspection (HW, SPW, SW, RCY)					
	Online inspection check lists available to all stakeholders (HW, SPW, SW, RCY)	- trnsprncy. - trust - customer service				
	Electronic submittal of annual reports w/ 1 hard copy, until placed in SHWIMS (HW, SPW, SW, RCY)					
	Workload distributed across regional boundaries (HW, SPW, SW, RCY)					
	Emphasize getting companies to Green Tier (HW, SPW, SW,)		- time commitment			
	For low impact facilities (ex. transfer stations, compost facilities), inspect only if a complaint (SW)		- risk - public expectations			
	Drop RU program evaluations – replace with some outreach (RCY)	-staff time to focus on waste reduction	-legislative questions -less contact with local govt. -change management issue w/-staff & locals	0 staff		
	<ul style="list-style-type: none"> Self reporting with checklist (SPW) - no DNR inspect - targeted audits or complaint based to follow-up on self-certification 	-facility more accountable -trust -less staff time	-risk	2 staff		
	<ul style="list-style-type: none"> Short-term: Centralize audit function (1-2 staff) (NMM) Long-term: Drop audit function – it becomes a county function (NMM) 	-less staff time -efficiency -consistency -local govt. runs their business	-could lose consistency -staff resistance -reduced fees	2 staff		

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POLICY DEVELOPMENT AND GUIDANCE – PROCESS: INTERNAL AND EXTERNAL	Use EMS Policy Process template program wide (HW, SW, SPW, RCY, NMM)	-consistency -efficiency -ease of understanding -more extensive, inclusive involvement -multiple value set	-skill sets -discomfort with stkhldrs. involvement -perception-politicizes program -currently more time intensive - net might be less	3 staff + resource teams		
POLICY DEVELOPMENT WHAT POLICIES MOVE US FORWARD	Use more enforcement discretion memos to allow best management of waste (SPW, HW, SW)					
	Green Tier – define to satisfy EPA’s issues (HW< SPW)					
	Short term: - fees and annual report submittal - incentive for counties to take program back Long term: Sunset state oversight (NMM)					
	Governor’s Blue Ribbon Task Force on Recycling and Reuse Program(RCY, SPW, SW) Comprehensive review of the Recycling Prgm. - ban Hg in products, - promote reuse and recycling, - product stewardship, - shared responsibility, - change enforcement procedures easier and realistic, - change grant program formula					
	Formalize licensing with respect to use of EMS (HW)					
	Allow pollution reduction credits (HW)					
	Governor’s Blue Ribbon Task Force - out of state waste, landfill capacity, fees					
	Recommendations Grid Revision: 04_12_05					

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ENFORCEMENT	ALL <ul style="list-style-type: none"> Targeted citation- low impact facilities- quick and easy Target enforcement based on waste hierarchy Revamp enforcement process and make clear Bring recycling in line with other enforcement (stepped enforcement) WEB listing of enforcement actions Stop taking enforcement action (ex. RU effective program, facilities with little or no environmental or health impacts) 	<ul style="list-style-type: none"> -consistency -reduce time -EPA will like 	<ul style="list-style-type: none"> -change in legislation -multiple divisions -backlash wrt a WEB listing or not taking enforcement action with some facilities 	0 staff (inspectors, auditors do this)		
TECHNICAL & COMPLIANCE ASSISTANCE	ALL <ul style="list-style-type: none"> Develop comprehensive plan for Assistance - Guidance on the WEB - use all kinds of technology for meetings, collaboration - VISITS • USE THE WEB - Technical contact list - use “PUSH” technology - make it easier to find and use information • Use trade associations- partner or have them take lead • Take advantage of offers- industry and EPA, local units of government • Limit span of competency - specialty areas for generalists 		<ul style="list-style-type: none"> -resource intensive -need to develop skill sets 	1 WEB person 1 Partnership person Editor 0.5 Training person		
COMPLAINT RESPONSE	<ul style="list-style-type: none"> Target which complaints to respond to • Use IT - Auto response - Analyze - Complaints on-line - Track - Route complaints • Who owns complaint - cooperate efforts between programs • Staff needs clear guidance on how to provide 	<ul style="list-style-type: none"> -environment benefit -time savings -staff time -better mgmt. -consistency -time, one letter -customer service - less confusing 	<ul style="list-style-type: none"> -concerns over not responding -\$ -skills -Change mgmt. 	Wrapped into inspections and site visits		

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DATA USE AND MANAGEMENT	<ul style="list-style-type: none"> Correct data, easy to use, used to set priorities, evaluate program, manage & assign resources Department wide data submittal-coordinated (ex lab data) Move to electronic reporting & certification - bi-directional Be more transparent and accessible (available to externals and internals) Consolidate and integrate systems - include EPA & other state agencies Better use of new technology- video conference E-forms and checklists Need to get useful information back out 	<ul style="list-style-type: none"> -efficient -consistency -managed -data based decisions -ease for customers 	<ul style="list-style-type: none"> -need support staff -develop staff skills -costs \$ -analysis skills -cross agency, multiple agency 	4 staff + contractor resources		
PROGRAM SUPPORT - NEEDS TO BE EVALUATED AND DISCUSSED				6 staff (1/region + bureau) 9 managers for program		

HW = Hazardous Waste Program

SPW = Special Waste Program

RCY = Recycling Program

SW = Solid Waste Program

NMN = Non-Metallic Mining Program

** = These are initial suggestions for the staff needed to do the business function or management system listed.

Self Certification = A system where the facility certifies that they are in compliance with state laws, and receives no DNR review or plan approval, and may or may not receive a license or other authorization.

Targeted Inspections = DNR selects a sector or geographic area to inspect, or selects facility to inspect to verify effectiveness of self-certification.

Specialty Teams = Dedicated small number of staff to work on specific activity (examples: HW licensing, sector inspection team, etc)

Electronic submittals or WEB use = Use of the WEB to submit applications, inspection information, self-certification forms (example: Recycling Annual Reports)